

EPA REGISTRATION
89333-3 Vol 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 14, 2015

Don O'Shaughnessy
Agent for Agria Canada, Inc.
c/o D. O'Shaughnessy Consulting, Inc.
427 Hide Away Circle
Club Run, KY 42729

Subject: PRIA Review – Acute toxicity studies to support registration in place of previous citations
Product Name: Mancozeb Technical
EPA Reg. No.: 89333-3
Application Date: 07/07/2015
Decision Number: 507157

Dear Mr. O'Shaughnessy:

The acute toxicity studies submission referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, has been reviewed. Please see the attached review dated 08/19/2015.

If you have any questions, you may contact Maryam K. Muhammad at 703-347-0301 or via email at Muhammad.maryam@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be "H. Johnson".

Hope Johnson, Product Manager 21
Fungicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

26/AUG/2015

MEMORANDUM

Subject: Acute Toxicity Review for EPA Reg. No. 89333-3

Name of Pesticide Product: Mancozeb Technical
EPA Reg. No.: 89333-3
DP Barcode: D428381
Decision No.: 507157
Action Code: R340
PC Code: 014504 (mancozeb)

From: Eugenia McAndrew, Biologist *Eugenia McAndrew*
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P) *M. Hashim*

Through: Masih Hashim, Ph.D., Team Leader Toxicology
Chemistry, Inerts and Toxicology Assessment Branch
Registration Division (7505P)

To: Maryam Muhammad, RM Team 21
Fungicide Branch
Registration Division (7505P)

Applicant: Agria Canada, Inc.
c/o D. O'Shaughnessy Consulting, Inc.

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Mancozeb	93.2
<u>Other Ingredient(s):</u>	<u>7.8</u>
	Total: 100.0

ACTION REQUESTED: The Risk Manager requests a review of six acute toxicity studies submitted to support registration of EPA Reg. No. 89333-3.

BACKGROUND: Agria Canada, Inc. is seeking to amend the registration for Mancozeb Technical, EPA Reg. No. 89333-3. The registrant has submitted six acute toxicity studies (MRIDs 495803-08 to -13) to support this product. The submission includes a label, company letter and a basic CSF dated January 17, 2012.

This product was registered in 2012 as a me-too of another registered product; therefore no product specific data were submitted. The Technical Review Branch assigned an acute toxicity profile to 89333-3 in a 2012 memo (Backus; D396597; EPA File Symbol 87845-U; 11/JAN/1012) as follows: EPA Toxicity Category III for acute oral, acute dermal, acute inhalation and primary eye irritation; EPA Toxicity Category IV for primary dermal irritation and the product is a non-sensitizer. The registrant now is submitting its own product specific data to support this registration.

GLP: Yes

DEVIATIONS: None

COMMENTS AND RECOMMENDATIONS:

1. The acute oral, acute dermal, acute inhalation, primary eye irritation and primary dermal irritation studies (MRIDs 495803-08 to -12) are acceptable.
2. The dermal sensitization study (MRID 49580313) is unacceptable. On page 14 of the study, the study author states: "Pilot study: The doses of test item used for each induction and challenge was well tolerated systemically and caused no irritation. It was determined in a pilot study with the test item at 0.125, 0.250, 0.375 and 0.5 g doses incorporated to vehicle." In Health Effects Test Guideline 870.2600, the procedure for determining the concentrations to be tested is described: "In the Buehler test, the concentration of the induction dose should be high enough to cause mild irritation, and the challenge dose should use the highest non-irritating concentration." The doses tested in the pilot study were not high enough to show any irritation.
3. Dermal sensitization will remain negative for 89333-3 because animal studies conducted on the manufacturing use product are negative (Reregistration Eligibility Decision for Mancozeb, September 2005).

4. The revised acute toxicity profile for Mancozeb Technical, EPA Reg. No. 89333-3, based on the studies reviewed in this memo is as follows:

acute oral toxicity	III	acceptable	MRID 49580308
acute dermal toxicity	III	acceptable	MRID 49580309
acute inhalation toxicity	IV	acceptable	MRID 49580310
primary eye irritation	III	acceptable	MRID 49580311
primary skin irritation	IV	acceptable	MRID 49580312
dermal sensitization	negative	cited	memo dated Jan. 11, 2012

LABELING: Based on the toxicity profile above, the following are the precautionary and first aid statements for this product as obtained from the Label Review System:

PRODUCT ID #: 089333-00003

PRODUCT NAME: Mancozeb Technical

PRECAUTIONARY STATEMENTS

SIGNAL WORD: CAUTION

Hazards to Humans and Domestic Animals:

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. [Wear protective eyewear.]

[Protective eyewear may be specified, if appropriate.]

First Aid:

If swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If in eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

DATA EVALUATION RECORD

Product Reg. No.: 89333-3

Product Name: Mancozeb Technical

1. DP BARCODE: 428381				
2. PC CODE: 014504				
3. CURRENT DATE: August 26, 2015				
4. TEST MATERIAL: Fortuna Technical [Batch # 306; 885.7 g/Kg Mancozeb; pH 6.72 (at 1%); solid]				
Study/Species/Lab Study # /Date	MRID	Results	Tox Cat	Core Grade
Acute oral toxicity / rat Bioagri Laboratories, Brazil Study # RF- A0317.3055.368.06/March 14, 2007 OCSPP 870.1100; OECD 423	49580308	LD ₅₀ Females > 2000 mg/kg The test substance was diluted in deionized water at a constant concentration of 200 mg/mL. Two groups of three female rats each were tested at a dose of 2000 mg/kg. All animals survived and gained weight. Dermal irritation (desquamation, erythema, edema and/or localized wounds) was observed at 9/10 dose sites between days 2 and 6. No other clinical signs of toxicity were observed. No macroscopic abnormalities were noted at necropsy.	III	A
Acute dermal toxicity / rat Bioagri Laboratories, Brazil Study # RF- A0317.310.349.06/March 14, 2007 OCSPP 870.1200; OECD 402	49580309	LD ₅₀ > 2000 mg/kg (both sexes) The test substance was moistened with distilled water to enhance contact with the skin. All animals survived and gained weight. One female exhibited an-genital staining but recovered by day 4. No macroscopic abnormalities were noted at	III	A

		necropsy.														
Acute inhalation toxicity / rat Bioagri Laboratories, Brazil Study # RF- A0317.309.277.06/March 14, 2007 OCSPP 870.1300; OECD 403	49580310	<p>LC₅₀ = 7.59 mg/L (both sexes) (CI = 6.36 to 9.06 mg/L)</p> <p>The concentration-mortality data were analyzed according to the <i>Trimmed Spearman-Karber</i> method and using suitable software.</p> <p>Three concentrations were tested using five males and five females: 2.45 mg/L, 6.39 mg/L and 9.03 mg/L.</p> <p><u>Results:</u></p> <table><tr><td></td><td>MMAD (µm)</td><td>GSD</td></tr><tr><td>2.45 mg/L</td><td>4.2</td><td>1.9</td></tr><tr><td>6.39 mg/L</td><td>3.9</td><td>1.9</td></tr><tr><td>9.03 mg/L</td><td>4.9</td><td>2.0</td></tr></table> <p><u>Mortality:</u> 2.45 mg/L: none</p> <p>6.39 mg/L: 3/10</p> <p>9.03 mg/L: 7/10</p> <p><u>Clinical signs:</u> 2.45 mg/L: Dyspnea, wheezing, bilateral serous nasal secretion (with and without blood) beginning on days 1 or 2 with recovery by day 6. Two females lost weight during the study. All other animals gained weight.</p> <p>6.39 mg/L: One male and two females died within the first day. Toxic signs noted prior to death were dyspnea, wheezing, bilateral serous nasal secretion (with and</p>		MMAD (µm)	GSD	2.45 mg/L	4.2	1.9	6.39 mg/L	3.9	1.9	9.03 mg/L	4.9	2.0	IV	A
	MMAD (µm)	GSD														
2.45 mg/L	4.2	1.9														
6.39 mg/L	3.9	1.9														
9.03 mg/L	4.9	2.0														

		<p>without blood). The same clinical signs were observed in the surviving animals with recovery by day 7. All surviving males lost weight by day 7 but gained weight by day 14. Surviving females gained weight by the end of the study.</p> <p>9.03 mg/L: Three males and three females died within the first day and one female within the second day. Toxic signs noted prior to death were ataxia, dyspnea, wheezing, bilateral serous (foamy or not) nasal secretion (with and without blood). The same clinical signs were observed in the surviving animals with recovery by day 4. Surviving animals gained weight on days 7 and 14.</p> <p><u>Necropsy:</u></p> <p>2.45 mg/L: No macroscopic abnormalities were noted.</p> <p>6.39 mg/L: Bilateral serous nasal secretion, laryngotracheal serous secretion (greenish or not), pleural effusion, pulmonary congestion and edema were observed in the decedents only.</p> <p>9.03 mg/L: Bilateral serous nasal secretion, laryngotracheal serous-foamy secretion (greenish or not), pleural effusion, pulmonary congestion and edema were observed in the decedents only.</p>		
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Primary eye irritation / rabbit Bioagri Laboratories, Brazil Study # RF- A0317.312.464.06/March 14, 2007 OCSPP 870.2400; OECD 405	49580311	3 females tested Test substance was sieved before instillation of 0.1 mg into each eye. No corneal opacity or iritis were observed. Positive conjunctival chemosis was noted in all eyes at one hour and in one eye at 24 hours. Positive conjunctival redness was noted in all eyes at 24 and 48 hours. Discharge (not a positive effect) was noted in all eyes. No positive effects were observed on day 4. All eyes were free of irritation on day 7.	III	A
Primary dermal irritation / rabbit Bioagri Laboratories, Brazil Study # RF- A0317.311.367.06/March 14, 2007 OCSPP 870.2500; OECD 404	49580312	PDI = 0.9 3 females tested The test item was placed onto a moistened gauze dressing and then applied to the dose sites. Very slight edema was noted at 2/3 dose sites one hour after patch removal resolving by 24 hours. Very slight erythema was noted at 3/3 dose sites from 24 hours through 72 hours. All sites were free of dermal irritation by day 7.	IV	A
Dermal sensitization /guinea pig Bioagri Laboratories, Brazil Study # RF- A0317.318.326.06/March 14, 2007 OCSPP 870.2600; OECD 406	49580313	The results show that this product is not a sensitizer but the study is classified as unacceptable. The test substance was sieved and corn oil was used as a vehicle. The dose chosen for the both the induction and challenge was 0.5 g in 0.7 mL of corn oil. The concentration chosen for the definitive study was not high	--	U

		<p>enough to cause any irritation in the pilot study. Higher concentrations should have been tested.</p> <p>No dermal irritation was observed in the control or the test animals at the challenge.</p> <p>Appropriate historical positive control study provided.</p>		
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**Core Grade Key: A =Acceptable, S = Supplementary, U = Unacceptable, D = Data Gap
W = Waived**

Muhammad, Maryam K.

From: Muhammad, Maryam K.
Sent: Monday, September 14, 2015 3:43 PM
To: 'Don O'Shaughnessy'; 'Don O'Shaughnessy'
Subject: EPA REG. NOs. 89333-2 and -3 Suggested Label Revisions to accompany next label amendment submission
Attachments: 89333-2-20150406 mm-ToxUpdate hj.pdf; 89333-3-20150615 mmToxUpdate hj.pdf

Dear Mr. O'Shaughnessy:

The Agency suggests that you update your labels for your next label amendment submission for the following products: 89333-2 and 89333-3

Please see attached label with comments.

If you have questions concerning this letter, please contact me at 703-347-0301 or via email at Muhammad.maryam@epa.gov.

Thank your for your time.

Regards,

MARYAM K. MUHAMMAD | BIOLOGIST | REGISTRATION DIVISION | U.S. EPA, OFFICE OF PESTICIDE PROGRAMS | PHONE: 703.347.0301

doc
D. O'Shaughnessy Consulting, Inc.

Aug. 22, 2015

Ms. Heather Garvie (PM 24)
US EPA, RD (7504P)
Rm. S-4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202-4501

Dear Ms. Garvie,
RE: Supplemental data, application to register Mancozeb 85 WP Manufacturing Concentrate on behalf of Agria Canada, Inc. (89333-U)

Enclosed is a CD with a response to the email from Maryam Muhammad, Aug. 11, 2015. (text attached):

*Hi Mr. O'Shaughnessy,
I hope all is well.*

Thank you for submitting the revised studies with the missing page numbers. Our science division is reviewing these studies.

I just wanted to remind you that your dermal sensitization study is still missing a positive control and must be resubmitted in order to complete the review.

Please let me know the status of our request.

Best Regards,

Maryam K. Muhammad | Biologist | Registration division | U.S. EPA, Office of Pesticide Programs | Phone: 703.347.0301

Specifically, The CD has on it the positive control data from BioAgri from the time period related to the sensitization data submitted. This positive control study will support the pending application for 89333-U, as well as Mancozeb Technical (89333-3) and 80% Manufacturing Concentrate (89333-2). Accordingly, I also enclose updated Matrices for these latter 2 products as hard copy.

As always, thank you for your attention to this so far, and if you require any further action, please contact me at the co-ordinates on this letterhead or at my cell # (270-537-5139).

Sincerely,



Don O'Shaughnessy, Ph.D., DABT

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

D. O'Shaughnessy Consulting, Inc., 427 Hide Away Circle, Cub Run, KY 42729
for

Agria Canada, Inc.

2. Regulatory Action in Support of Which This Package is Submitted

Application to register Mancozeb 85 WP Manufacturing Use Concentrate
containing mancozeb

3. Transmittal Date

Aug 19, 2015

4. List of Submitted Materials (e-submission on DVD)

Volume 1 of 4: Administrative materials (Cover letter, this Document, updated
data matrix)

Volume 2 of 2: Positive Control Data for Guinea Pig Sensitization, BioAgri Labs,
2006 **MRID 49580308**

Transmitted by: Don O'Shaughnessy, Ph.D., DABT, DABFM



Contact Information: tel. 270.524.5633 / cell 270-537-5139
fax 270.524.5634
email doctoc@mac.com

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 7-8-15

Experts In-Processing Signature: B.B.

Date 7-23-15

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>89333-3</u>		EPA Receipt Date: <u>7-8-15</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1) signed & complete including package type			<input checked="" type="checkbox"/>		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)					<input checked="" type="checkbox"/>
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
	Certificate and data matrix consistent					
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					<input checked="" type="checkbox"/>
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			<input checked="" type="checkbox"/>		
5	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)	<input checked="" type="checkbox"/>				
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (<u>Electronic labels on CD</u> are encouraged and guidance is available)					<input checked="" type="checkbox"/>
7	Is the data package consistent with PR Notice 86-5			<input checked="" type="checkbox"/>		
8	Notice of Filing included with petitions					<input checked="" type="checkbox"/>

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
	<u>Required Data</u> and/or data waivers. See Footnote C.			
10	a) List study (or studies) not included with application			

Comments:

Documentation: Pass
 • Required forms are complete.

Inserts: N/A
 • No inserts to review.

11-3: (Fail)

MRIID - 495803
 • Studies were completed in April and partially accepted.

Status: (Fail)

T.D. 2/20/15

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the inert Web site and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch.

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Jackson, Tracy

From: Jackson, Tracy
Sent: Tuesday, July 28, 2015 1:44 PM
To: 'doctox@mac.com'
Subject: Application Reg# 89333-2 and 89333-3

Dear Dr. O'Shaughnessy,

I am contacting you regarding your submission in support of **Mancozeb 80WP Manufacturing Concentrate (89333-2)** and **Mancozeb Technical (89333-3)**. A Certification with Respect to Citation of Data is required with this submission, because a data matrix is present.

Please send form for both registrations to jackson.tracy@epa.gov

Thank You

Tracy Jackson
EPA Contractor
703-308-7227
2777 S. Crystal Drive
Arlington, VA 22202



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 22, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-507157
EPA File Symbol or Registration Number: 89333-3
Product Name: Mancozeb Technical
EPA Receipt Date: 08-Jul-2015
EPA Company Number: 89333
Company Name: AGRIA CANADA, INC.

DON O'SHAUGHNESSY, PH.D
D. O'SHAUGHNESSY CONSULTING, INC.
AGENT FOR AGRIA CANADA, INC.
427 HIDE AWAY CIRCLE
CUB RUN, KY 42729-

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340

AMENDMENT;NON-FAST TRACK;REVIEW WITHIN RD, E.G. PRECAUTIONARY LABELING;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

A handwritten signature in black ink, appearing to be "m. j. h.", written over the word "Sincerely,".

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

{971025Ä~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

21

Receipt No.

S-

971025

EPA File Symbol/Reg. No.

89333-3

Pin-Punch Date:

7/8/2015

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R340

Granted:

R340

Amount Due: \$ 3798

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: per Steve Schaefer

Date: 7/10/15

Remarks:

(see email)

S: 971025

Milestone Email: doctox@mac.com

Regulatory Type: Product Registration - Section 3



Resubmission: ☐ Yes ☒ No

Application Type: Amendment



Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No



Company: 89333 AGRIA CANADA, INC.

Risk Manager: Registration Division, Risk Management Team 21



Product #: 89333-3

Product Name: Mancozeb Technical

Override#:

Me Too Section3: 19713-613

Me Too Product Name: DREXEL MANCOZEB TECHNICAL

Application Date: 07-Jul-2015



OPP Rec'd Date: 08-Jul-2015



Front End Date: 10-Jul-2015



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Amendment with 6-pack of acute toxicity data.

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content	Des
Study	

View/Edit

Yanchulis, Michael

From: Don O'Shaughnessy <doctox@mac.com>
Sent: Wednesday, July 22, 2015 11:59 AM
To: Yanchulis, Michael
Subject: Fwd: Pay.gov Payment Confirmation: PRIA Service Fees

Don O'Shaughnessy, Ph.D., DABT, DABFM
President, DOC Inc.
427 Hide Away Circle
Cub Run KY 42729
270-524-5633 cell 270-537-5139
doctox@mac.com
www.regtox.net

Begin forwarded message:

From: notification@pay.gov
Subject: **Pay.gov Payment Confirmation: PRIA Service Fees**
Date: July 22, 2015 at 10:55:06 AM CDT
To: doctox@mac.com

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25MFR7B7
Agency Tracking ID: 74843020214
Transaction Type: Sale
Transaction Date: 07/22/2015 11:55:06 AM EDT

Account Holder Name: Don O'Shaughnessy

Transaction Amount: \$3,798.00
Billing Address: 427 Hide Away Circle
Billing Address 2:
City: Cub Run
State/Province: KY
Zip/Postal Code: 42729
Country: USA

Card Type: Visa

Card Number: *****2331

Registration Number: 89333-3

Company Name: DOC Inc.

Company Number: 89333

Action Code: R340

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Yanchulis, Michael

From: Schaible, Stephen
Sent: Friday, July 10, 2015 1:11 PM
To: Don O'Shaughnessy; Johnson, Hope
Cc: Giles-Parker, Cynthia; Muhammad, Maryam K.; Downs, Teresa; Yanchulis, Michael
Subject: RE: 89333-U; acute toxicity data submitted in support of this pending product

Hi Don,

These two applications for EPA Registration Numbers 89333-2 and 89333-3 should have been submitted to the Front End Document Processing Center identified as PRIA applications (each one being an R340) with proof of payment for each. Because they were not identified as PRIA in the cover letter, they were sent upstairs to the PM to which they were addressed. All of that being said, I have spoken with Mick Yanchulis in our Information Services Branch and he will process these as if they had come as PRIA and will invoice you for the two outstanding R340 payments. You should get that email today or Monday, and the PRIA clock on these will start 21-days from the receipt of payment.

These two R340 actions (reviewing the two sets of acute toxicity studies, evaluating whether label changes to the product labels would be required based on these data) will be evaluated separately from the new product application that was previously submitted for EPA File Symbol 89333-U, but the results of those reviews will inform the waiver-type argument that you are making with regard to new product application (that given the acute toxicity characteristics of the active ingredient in question, one should be able to cite data reflecting a different % a.i. to support the proposed new product).

Have a great weekend!

Best regards, Steve

Stephen A. Schaible, PRIA Ombudsman
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
ph: (703)308-9362

From: Don O'Shaughnessy [mailto:doctox@mac.com]
Sent: Wednesday, July 08, 2015 11:04 AM
To: Johnson, Hope
Cc: Giles-Parker, Cynthia; Schaible, Stephen; Muhammad, Maryam K.; Downs, Teresa
Subject: Re: 89333-U; acute toxicity data submitted in support of this pending product

Sent yesterday by UPS - should be at your mailroom today.

Johnson, Hope

From: Johnson, Hope
Sent: Thursday, July 09, 2015 12:41 PM
To: Schaible, Stephen
Cc: Muhammad, Maryam K.; Giles-Parker, Cynthia
Subject: FW: 89333-U; acute toxicity data submitted in support of this pending product
Attachments: applicmancotechacutetox7-7-15.pdf; ATT00001.htm; matrixmanco80WPjuly7-15.pdf; ATT00002.htm; matrixmancotechjuly7-15.pdf; ATT00003.htm; applic80WPacutetox7-7-15.pdf; ATT00004.htm

He sent these in regular correspondence without payment stating "I am uncertain what the PRIA fee implication would be given the fee included with the original submission of 89333-U. I trust you will advise on how this impacts on fee, at which time I can deal with this through "pay.gov"

Steve- can you respond directly to him regarding these being sent to be coded 2 separate R340 actions and the fee and timeframes associated? Can you get these coded? I can drop them off to you.

Thanks,
Hope

From: Don O'Shaughnessy [mailto:doctox@mac.com]
Sent: Wednesday, July 08, 2015 11:04 AM
To: Johnson, Hope
Cc: Giles-Parker, Cynthia; Schaible, Stephen; Muhammad, Maryam K.; Downs, Teresa
Subject: Re: 89333-U; acute toxicity data submitted in support of this pending product

Sent yesterday by UPS - should be at your mailroom today.

doc
D. O'Shaughnessy Consulting, Inc.

July 7, 2015

Ms. Hope Johnson (PM 21)
US EPA, RD (7504P)
Rm. S-4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202-4501

Dear Ms. Johnson,
RE: Revised data matrices 89333-2, 89333-3 per your email of June 29, 2015 (regarding 89333-U, Decision No. 499556)

Enclosed is a response to the subject email (text attached):

The Agency has begun review of your resubmissions dated March 8, 2015, June 4, 2015 and June 9, 2015 for EPA File Symbol No. 89333-U; Decision Number 499556. You have submitted 2 sets of new 6-pack acute toxicity data not previously reviewed by the Agency, which support EPA Registration Numbers 89333-3 and 89333-2, and a bridging argument to satisfy the acute toxicity data requirements for -U based on these data.

We find it more appropriate that each new 6-pack of acute toxicity data be submitted as a R340 PRIA action under the corresponding Registration the data supports (either 89333-3 or 89333-2). The data you submitted could result in revised acute toxicity categories for 89333-3 and/or 89333-2 if the Agency review of this data results in categories that differ from the previously cited data for the respective products. Once the data is reviewed under each separate Registration Number, the Agency can then review the bridging argument for your pending R310 PRIA action (89333-U) and refer to the separate Agency reviews for -2 and -3.

Please note that the new studies, once reviewed, may require label changes regarding Precautionary or First Aid Statements for -2 or -3 if the acute toxicity categories differ from the previously cited data. Please respond with your proposed course of action regarding 89333-U, -2 and -3 by Wednesday July 8, 2015.

Agria Canada hereby submits revised matrices for 89333-2 and 89333-3. According to my evaluation of the label review manual and the acute toxicity data, no label changes appear to be required. In absence of any response to my query about re-submitting these data under new MRIDs, I have taken the position that it is less confusing to simply refer to the MRIDs of the studies already submitted March 8, 2015 (copy of that transmittal document is enclosed).

I am uncertain what the PRIA fee implication would be given the fee included with the original submission of 89333-U. I trust you will advise on how this impacts on fee, at which time I can deal with this through "pay.gov".

As always, thank you for your attention to this so far, and if you require any further action, please contact me at the co-ordinates on this letterhead or at my cell # (270-537-5139).

Sincerely,



Don O'Shaughnessy, Ph.D., DABT

427 Hide Away Circle, Cub Run, KY 42729

207 Bank St., Ste. 412, Ottawa, ON CANADA K2P 2N2

Phone 270-524-5633

cell 270-537-5139

email doctox@mac.com

www.regtox.net

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

D. O'Shaughnessy Consulting, Inc., 427 Hide Away Circle, Cub Run, KY 42729
for

Agria Canada, Inc.

2. Regulatory Action in Support of Which This Package is Submitted

Application to register Mancozeb 85 WP Manufacturing Use Concentrate
containing mancozeb

3. Transmittal Date

March8, 2015

4. List of Submitted Materials (e-submission on DVD)

Volume 1 of 14: Administrative materials (Cover letter, this Document, data
matrix)

Volume 2 of 14 : Rationale to rely on acute toxicity data for 80% WP + mancozeb
technical in support of 85% WP MRID 49580301

Volume 3 of 14: Acute oral toxicity, Mancozeb 80 WP MRID 49580302

Volume 4 of 14: Acute dermal toxicity, Mancozeb 80 WP MRID 49580303

Volume 5 of 14: Acute inhalation toxicity, Mancozeb 80 WP MRID 49580304

Volume 6 of 14: Dermal irritation, Mancozeb 80 WP MRID 49580305

Volume 7 of 14: Eye irritation, Mancozeb 80 WP MRID 49580306

Volume 8 of 14: Sensitization, Mancozeb 80 WP MRID 49580307

Volume 9 of 14: Acute oral toxicity, Mancozeb technical MRID 49580308

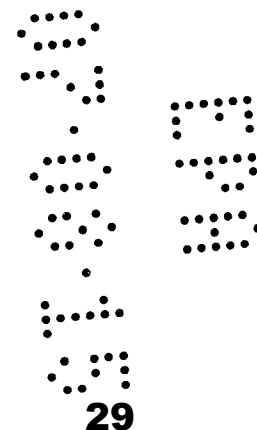
Volume 10 of 14: Acute dermal toxicity, Mancozeb technical MRID 49580309

Volume 11 of 14: Acute inhalation toxicity, Mancozeb technical MRID 49580310

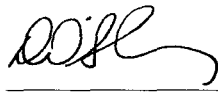
Volume 12 of 14: Dermal irritation, Mancozeb technical MRID 49580312

Volume 13 of 14: Eye irritation, Mancozeb technical MRID 49580311

Volume 14 of 14: Sensitization, Mancozeb technical MRID 49580313



Transmitted by: Don O'Shaughnessy, Ph.D., DABT, DABFM



Contact Information: tel. 270.524.5633 / cell 270-537-5139
fax 270.524.5634
email doctox@mac.com

Page 2 of 2

30



United States
Environmental Protection Agency
Washington, DC 20460

☐
☐
☒

Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 89333-3	2. EPA Product Manager Hope Johnson	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Agria Canada, Inc. / Mancozeb Technical Fungicide	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Agria Canada, Inc., 207 Bank St., Suite 412 Ottawa ON Canada K2P 2N2 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Change of support for acute toxicity data requirements from "cite all" to "OWN", with reference to data submitted March 8, 2015 for 89333-U

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) foil and poly-lined paper bag	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 30 lb, 50 lb		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Don O'Shaughnessy		Title Agent	
		Telephone No. (Include Area Code) 270-524-5633	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Don O'Shaughnessy		5. Date July 7, 2015	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Agria Canada, Inc..	EPA Registration Number/File Symbol 89333-3
Active Ingredient(s) and/or representative test compound(s) mancozeb	Date 07/28/2015
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) outdoor food, non-food	Product Name Mancozeb Technical Fungicide

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).



I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)



I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).



I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]



I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 07/28/2015	Typed or Printed Name and Title Don O'Shaughnessy, Agent
--	--------------------	---

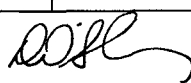
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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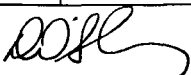
DATA MATRIX

Date 07/072015			EPA Reg. No./File Symbol 89333-3		Page 1 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 207 Bank St., Suite 412 Ottawa ON Canada K2P 2N2			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	(CSF) 48449100	Agria Canada, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	48449101	Agria Canada, Inc.	OWN	
830.1620	Description of Manufacturing Process	48449101	Agria Canada, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	48449101	Agria Canada, Inc.	OWN	
830.1750	Certified Limits	48229200	Agria Canada, Inc.	OWN	
830.1800	Enforcement analytical method	48449102	Agria Canada, Inc.	OWN	
830.6303	Physical State	48449103	Agria Canada, Inc.	OWN	
830.6304	Odor	48449103	Agria Canada, Inc.	OWN	
830.7300	Density	48449103	Agria Canada, Inc.	OWN	
830.6302	Color	48449103	Agria Canada, Inc.	OWN	
830.7000	pH	48449103	Agria Canada, Inc.	OWN	
830.7200	Melting point	48449103	Agria Canada, Inc.	OWN	
830.7220	Boiling point	48449103	Agria Canada, Inc.	OWN	
830.6315	Flammability	48449103	Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 07/072015

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401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 07/072015			EPA Reg. No./File Symbol 89333-3		Page 2 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explosivity	48449103	Agria Canada, Inc.	OWN	
830.1700	Preliminary Analysis	48449102	Agria Canada, Inc.	OWN	
870.1100	acute oral toxicity	49580308	Agria Canada, Inc.	OWN	
870.1200	acute dermal toxicity	49580309	Agria Canada, Inc.	OWN	
870.1300	acute inhalation toxicity	49580310	Agria Canada, Inc.	OWN	
870.2400	acute eye irritation	49580311	Agria Canada, Inc.	OWN	
870.2500	acute dermal irritation	49580312	Agria Canada, Inc.	OWN	
870.2600	sensitization	49580313	Agria Canada, Inc.	OWN	
860.1500	magnitude of residue in walnuts	48645401	United Phosphorus, Inc.	PAY	1
generic data		cite all	cite all	PAY	1
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 07/072015

DATA MATRIX FOOTNOTES

Date 07/072015	EPA Reg. No./File Symbol 843-3-3	Page 3 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Signature 	Name and Title Don O'Shaughnessy, Agent	Date 07/072015
--	--	-------------------

MANCOZEB DATA SUBMITTERS

SYNGENTA CROP PROTECTION, LLC
P.O. Box 18300
GREENSBORO, NC 27419

BAYER CROPSCIENCE LP
P.O. Box 12014
2 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

E. I. DU PONT DE NEMOURS AND CO., INC.
1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDONNELL BLVD.
ST. LOUIS, MO 63042

CEREXAGRI, INC.
630 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

BASF CORPORATION
P.O. Box 13528
26 DAVIS DRIVE
RESEARCH TRIANGLE PARK, NC 27709

MANCOZEB TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 308/2E
INDIANAPOLIS, IN 46268

EBDC/ETU TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

SPRAY DRIFT TASK FORCE
1900 K STREET, NW
WASHINGTON, DC 20006

UNITED PHOSPHORUS, INC
630 FREEDOM BUSINESS CENTER,
SUITE 402
KING OF PRUSSIA, PA 19401

AGRICULTURAL REENTRY TASK FORCE
1350 I STREET, N.W.
WASHINGTON, DC 20005

AGSCO INC
P.O. Box 13458
GRAND FORKS, ND 58208

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALLL DR. .
ATLANTA, GA 30341

AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
P.O. Box 509
1720 PROSPECT DRIVE
MACON, MO 63552

PLANT PROTECTANTS, LLC
35801 ROAD 132
VISALIA, CA 93292

GENERIC ENDANGERED SPECIES TASK FORCE
4110 136TH STREET, NORTHWEST
GIG HARBOR, WA 98332

FIFRA ENDANGERED SPECIES TASK FORCE, LLP
1350 I STREET, NW
WASHINGTON, DC 20006

CHEMINOVA, INC.
ONE PARK DRIVE, SUITE 400
RESEARCH TRIANGLE PARK, NC 27709

MACDERMID AGRICULTURAL SOLUTIONS, INC.
ATTN: REGISTRATION DEPARTMENT
245 FREIGHT STREET

WATERBURY,CT 06702 WILBUR-ELLIS COMPANY
2903 S. CEDAR AVENUE
FRESNO,CA 93725

EVERRIS NA, INC.
P.O. Box 3310
DUBLIN,OH 43016

OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE
BEVERIDGE & DIAMOND, P.C.
1350 I STREET, N.W.
WASHINGTON,DC 20005

AGROMARKETING CO, INC
D O'SHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN,KY 42729

SIMPLOT, J.R. COMPANY
P.O. Box 198
LATHROP,CA 95330

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALLL DR. .
ATLANTA,GA 30341

SEPRO CORPORATION
11550 N. MERIDIAN ST., SUITE 600
CARMEL,IN 46032


RESIDENTIAL EXPOSURE JOINT VENTURE (RE
CSPA/PIR
1667 K STREET, NW, SUITE 300
WASHINGTON,DC 20006

ZENITH CROP SCIENCES, S.A.
D. O'SHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN,KY 42729

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 07/072015			EPA Reg. No./File Symbol 89333-3		Page 1 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
Signature 	Name and Title Don O'Shaughnessy, Agent		Date 07/072015		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 07/072015			EPA Reg. No./File Symbol 89333-3		Page 2 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			United Phosphorus, Inc.	PAY	1
			cite all	PAY	1
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 07/072015

DATA MATRIX FOOTNOTES

Date 07/072015	EPA Reg. No./File Symbol 89333-3	Page 3 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Signature 	Name and Title Don O'Shaughnessy, Agent	Date 07/072015
--	--	-------------------

MANCOZEB DATA SUBMITTERS

SYNGENTA CROP PROTECTION, LLC
P.O. Box 18300
GREENSBORO, NC 27419

BAYER CROPSCIENCE LP
P.O. Box 12014
2 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

E. I. DU PONT DE NEMOURS AND CO., INC.
1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDONNELL BLVD.
ST. LOUIS, MO 63042

CEREXAGRI, INC.
630 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

BASF CORPORATION
P.O. Box 13528
26 DAVIS DRIVE
RESEARCH TRIANGLE PARK, NC 27709

MANCOZEB TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 308/2E
INDIANAPOLIS, IN 46268

EBDC/ETU TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

SPRAY DRIFT TASK FORCE
1900 K STREET, NW
WASHINGTON, DC 20006

UNITED PHOSPHORUS, INC
630 FREEDOM BUSINESS CENTER,
SUITE 402
KING OF PRUSSIA, PA 19401

AGRICULTURAL REENTRY TASK FORCE
1350 I STREET, N.W.
WASHINGTON, DC 20005

AGSCO INC
P.O. Box 13458
GRAND FORKS, ND 58208

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALL DR. .
ATLANTA, GA 30341

AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
P.O. Box 509
1720 PROSPECT DRIVE
MACON, MO 63552

PLANT PROTECTANTS, LLC
35801 ROAD 132
VISALIA, CA 93292

GENERIC ENDANGERED SPECIES TASK FORCE
4110 136TH STREET, NORTHWEST
GIG HARBOR, WA 98332

FIFRA ENDANGERED SPECIES TASK FORCE, LLP
1350 I STREET, NW
WASHINGTON, DC 20006

Cheminova, Inc.
One Park Drive, Suite 400
Research Triangle Park, NC 27709

MACDERMID AGRICULTURAL SOLUTIONS, INC.
ATTN: REGISTRATION DEPARTMENT
245 FREIGHT STREET

WATERBURY,CT 06702 WILBUR-ELLIS COMPANY
2903 S. CEDAR AVENUE
FRESNO,CA 93725

EVERRIS NA, INC.
P.O. Box 3310
DUBLIN,OH 43016

OUTDOOR RESIDENTIAL EXPOSURE TASK FORC
BEVERIDGE & DIAMOND, P.C.
1350 I STREET, N.W.
WASHINGTON,DC 20005

AGROMARKETING CO, INC
D O'SHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN,KY 42729

SIMPLOT, J.R. COMPANY
P.O. Box 198
LATHROP,CA 95330

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALLL DR. .
ATLANTA,GA 30341

SEPRO CORPORATION
11550 N. MERIDIAN ST., SUITE 600
CARMEL,IN 46032

RESIDENTIAL EXPOSURE JOINT VENTURE (RE
CSPA/PIR
1667 K STREET, NW, SUITE 300
WASHINGTON,DC 20006

ZENITH CROP SCIENCES, S.A.
D. O'SHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN,KY 42729

PROCESSING REQUEST

Reg #89333-3

Decision #493612

Description: new accepted label

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

☒ Dated:
6/15/2015

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☐ New CSF(s) Dated:

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Hope Johnson

Division: RD

Phone: 305-5410

Date: 6/16/2015



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 15, 2015

Dr. Don O'Shaughnessy
Agent for Agri Canada, Inc.
D. O'Shaughnessy Consulting, Inc.
427 Hide Away Circle
Cub Run, KY 42729-8692

Subject: Label Amendment –Adding me-too use on walnut
Product Name: Mancozeb Technical
EPA Registration Number: 89333-3
Application Date: 7/22/2014; resubmission dated 6/11/2015
Decision Number: 493612

Dear Dr. O' Shaughnessy:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2
EPA Reg. No. 89333-3
Decision No. 493612

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact me by phone at (703) 305-5410 or via email at johnson.hope@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'HJ' with a large loop, positioned above the typed name.

Hope Johnson, Product Manager 21
Fungicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure:
-Main product label stamped "Accepted"

MANCOZEB TECHNICAL
A Fungicide for Formulating Use.

ACTIVE INGREDIENT:

Mancozeb (a coordination product of zinc ion and manganese ethylenebis- dithiocarbamate) . . .
..... 93.2 %
(in which the ingredients are:)
Manganese++ 18.4 %
Zinc++ 2.2 %
Ethylenebisdithiocarbamate ion (C₄H₆N₂S₄) . . . 70.5 %

OTHER INGREDIENTS 6.8 %
TOTAL: 100.0 %

KEEP OUT OF REACH OF CHILDREN

CAUTION

ACCEPTED

06/15/2015

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 89333-3

FIRST AID

IF SWALLOWED:

- Call poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 to 20 minutes.
- Call a poison control center or doctor for treatment advice.

IF IN EYES:

- Hold eye open and rinse slowly and gently with water or 15 to 20 minutes.
- Remove contact lenses, if present, after the first minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

IF INHALED:

- Move person to fresh air.
- If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
- Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

EPA Reg. No. 89333-3

EPA Est. No. _____

Net Contents _____

Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8
416-628-5174

Product of Bulgaria

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Avoid breathing dust.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public water unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority.

For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Field Corn, Corn grown for seed, Popcorn, Cotton (except foliar use), Peanuts, Sugarbeets, Wheat, Barley, Oats, Rye, Asparagus, Sweet corn, Cucumbers, Fennel, Melons (including Cantaloupes, Casabas, Crenshaws, Honeydews, Watermelons), Onions (dry bulb and furrow drench), Potatoes, Potato tuber, Squash (summer), Tomatoes, Apples, Crabapples, Pears, Quince, Bananas, Cranberries, Grapes, Papayas, Ornamentals, walnuts.

This product may be used to formulate products for specific use(s) not listed on this manufacturing use product label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

Manufacturers of products formulated as wettable powders must prohibit the following:

- application of wettable powder products to turf on sod farms
- application of wettable powder formulations to turf unless packaged in water soluble packaging

Manufacturers of products formulated as liquids must prohibit the following:

- application of liquids aerially to sod farms

This product may not be used to manufacture end use products for use on golf courses.

Manufacturers of products formulated as dusts must require closed systems for commercial seed and seedpiece treatment.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE: Store in original container in a dry area. If allowed to become wet, the product will deteriorate and present a fire hazard. Keep away from sources of ignition, (e.g. sparks and open flame.) Close bag when not in use. Do not store in a manner where cross-contamination with other pesticides, fertilizers, food or feed could occur. If spilled during storage or handling, sweep up spillage and dispose of in accordance with the Pesticide Disposal Instructions listed below.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

WARRANTY AND CONDITIONS OF SALE

Agria Canada, Inc. warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for use therein described when used in accordance with the Directions for Use set forth in the label.

To the extent permitted under applicable law, any damage arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages, such as loss of profits or values or any other special or indirect damages.

Agria Canada, Inc. makes no other express or implied warranty including any other express or implied warranty of FITNESS or MERCHANTABILITY.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

The sale of this product does not include a license under any patent owned by **Agria Canada, Inc.**

Johnson, Hope

From: Don O'Shaughnessy <doconsit@earthlink.net>
Sent: Thursday, June 11, 2015 3:24 PM
To: Johnson, Hope
Subject: Re: Mancozeb Technical, EPA Registration Number 89333-3, Decision Number 493612 Fast Track Amendment to Add Walnuts (Me-too Amendment)
Attachments: USmancotechaddwalnutJune11-15.pdf; ATT00001.htm

QED

Johnson, Hope

From: Don O'Shaughnessy <doconst@earthlink.net>
Sent: Thursday, June 11, 2015 11:50 AM
To: Johnson, Hope
Subject: Re: Mancozeb Technical, EPA Registration Number 89333-3, Decision Number 493612 Fast Track Amendment to Add Walnuts (Me-too Amendment)
Attachments: USmancotechaddwalnutJune11-15.pdf, ATT00001.htm
Importance: High

Thank you for your inputs. I think this one captures it all.

With regard to PRN20017-4, please note that the product is in a foil-lined paper bag, so ...

For pesticide products sold or distributed in nonrefillable containers, the 40 CFR § 156.146 requirement for residue removal instructions applies only to dilutable (liquid or solid) pesticides in rigid containers. Therefore, ready-to-use pesticides or pesticides in flexible containers (such as plastic or paper bags) are not required to bear these residue removal instructions.

Johnson, Hope

From: Johnson, Hope
Sent: Thursday, June 11, 2015 6:27 AM
To: 'Don O'Shaughnessy'
Subject: RE: Mancozeb Technical, EPA Registration Number 89333-3, Decision Number 493612 Fast Track Amendment to Add Walnuts (Me-too Amendment)
Attachments: 89333-3 hj comments 6.10.15.pdf
Importance: High

Don,

Regarding Page 2, please only delete "NOTE 1. Use on walnuts is permitted only with a supplemental label in effect up to the date indicated on the supplemental label." The associated footnote 1 at the end of the use listing also needs to be deleted.

The statement "Manufacturers of products formulated as dusts must require closed systems for commercial seed and seed piece treatment." is to be maintained.

See attached for the marked up PDF version. I've also revised Tamue's comments below to reflect the revisions I need.

You can send the revised label directly to me and I will process it, as Tamue is in another Branch now.

Thank you,
Hope

Hope A. Johnson
Product Manager 21
U.S. Environmental Protection Agency
Office of Pesticide Programs
Registration Division
Fungicide Branch
Phone: 703-305-5410
Mail Code 7505P

From: Don O'Shaughnessy [mailto:doconslt@earthlink.net]
Sent: Wednesday, June 10, 2015 4:39 PM
To: Gibson, Tamue
Cc: Johnson, Hope
Subject: Re: Mancozeb Technical, EPA Registration Number 89333-3, Decision Number 493612 Fast Track Amendment to Add Walnuts (Me-too Amendment)

will call tomorrow.
Don O'Shaughnessy, Ph.D., DABT, DABFM
President, DOC Inc.
427 Hide Away Circle

Cub Run KY 42729
270-524-5633 cell 270-537-5139
doctox@mac.com
www.regtox.net

On Jun 10, 2015, at 3:27 PM, Gibson, Tamue <Gibson.Tamue@epa.gov> wrote:

Dr. O'Shaughnessy. Your label needs revising. Please refer to the label for the label comments provided by Hope Johnson. Please revise your label and send it to Hope Johnson at Johnson.Hope@EPA.GOV. Also, please contact her at (703) 305-5410 for further discussion regarding this product labeling.

On page 2, delete the phrase "NOTE 1. Use on walnuts is permitted only with a supplemental label in effect up to the date indicated on the supplemental label." (and the associated footnote above)

On page 3, revise the following statement within the "STORAGE AND DISPOSAL" section to read " Do not contaminate water, food or feed by storage OR disposal."

On page 3, within the "STORAGE AND DISPOSAL" section for "Container Disposal". The container disposal section must comply with PR Notice 2007-4.

Thank you.

Tamue
<89333-3 hj comments 6.10.15.pdf>

Johnson, Hope

From: Don O'Shaughnessy <doconsit@earthlink.net>
Sent: Wednesday, June 10, 2015 4:39 PM
To: Gibson, Tamue
Cc: Johnson, Hope
Subject: Re: Mancozeb Technical, EPA Registration Number 89333-3, Decision Number 493612 Fast Track Amendment to Add Walnuts (Me-too Amendment)

will call tomorrow.

Don O'Shaughnessy, Ph.D., DABT, DABFM
President, DOC Inc.
427 Hide Away Circle
Cub Run KY 42729
270-524-5633 cell 270-537-5139
doctox@mac.com
www.regtox.net

On Jun 10, 2015, at 3:27 PM, Gibson, Tamue <Gibson.Tamue@epa.gov> wrote:

Dr. O'Shaughnessy. Your label needs revising. Please refer to the label for the label comments provided by Hope Johnson. Please revise your label and send it to Hope Johnson at Johnson.Hope@EPA.GOV. Also, please contact her at (703) 305-5410 for further discussion regarding this product labeling.

On page 2, delete the phrase "Manufacturers of products formulated as dusts must require closed systems for commercial seed and seed piece treatment. NOTE 1. Use on walnuts is permitted only with a supplemental label in effect up to the date indicated on the supplemental label. "

On page 3, revise the following statement within the "STORAGE AND DISPOSAL" section to read " Do not contaminate water, food or feed by storage disposal."

On page 3, within the "STORAGE AND DISPOSAL" section for "Container Disposal". The container disposal section must comply with PR Notice 2007-4.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by

incineration, or if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

Thank you.

Tamue

<89333-3 hj comments 6.10.15.pdf>

Gibson, Tamue


From: Don O'Shaughnessy <doctox@me.com>
Sent: Thursday, March 26, 2015 10:34 AM
To: Gibson, Tamue
Subject: Re: EPA Registration Numbers: 89333-2 and 89333-3 Please revise the data matrices
Attachments: matrixmancotechMar26-15.pdf; ATT00001.htm; matrixmanco80WP03-26-15.pdf; ATT00002.htm

One day later than anticipated, but back in the office.
Here you go.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

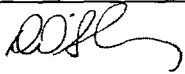
DATA MATRIX

Date 03/26/2015			EPA Reg. No./File Symbol 89333-3		Page 1 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 207 Bank St., Suite 412 Ottawa ON Canada K2P 2N2			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	(CSF) 48449100	Agria Canada, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	48449101	Agria Canada, Inc.	OWN	
830.1620	Description of Manufacturing Process	48449101	Agria Canada, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	48449101	Agria Canada, Inc.	OWN	
830.1750	Certified Limits	48229200	Agria Canada, Inc.	OWN	
830.1800	Enforcement analytical method	48449102	Agria Canada, Inc.	OWN	
830.6303	Physical State	48449103	Agria Canada, Inc.	OWN	
830.6304	Odor	48449103	Agria Canada, Inc.	OWN	
830.7300	Density	48449103	Agria Canada, Inc.	OWN	
830.6302	Color	48449103	Agria Canada, Inc.	OWN	
830.7000	pH	48449103	Agria Canada, Inc.	OWN	
830.7200	Melting point	48449103	Agria Canada, Inc.	OWN	
830.7220	Boiling point	48449103	Agria Canada, Inc.	OWN	
830.6315	Flammability	48449103	Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 03/26/2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 03/26/2015			EPA Reg. No./File Symbol 89333-3		Page 2 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explosivity	48449103	Agria Canada, Inc.	OWN	
830.1700	Preliminary Analysis	48449102	Agria Canada, Inc.	OWN	
870.1100	acute oral toxicity	cite all	cite-all	PAY	1
870.1200	acute dermal toxicity	cite all	cite all	PAY	1
870.1300	acute inhalation toxicity	cite all	cite all	PAY	1
870.2400	acute eye irritation	cite all	cite all	PAY	1
870.2500	acute dermal irritation	cite all	cite all	PAY	1
870.2600	sensitization	cite all	cite all	PAY	1
generic data		cite all	cite all	PAY	1
Signature			Name and Title Don O'Shaughnessy, Agent		Date 03/26/2015

DATA MATRIX FOOTNOTES		
Date 03/26/2015	EPA Reg. No./File Symbol 89333-3	Page 3 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Signature 	Name and Title Don O'Shaughnessy, Agent	Date 03/26/2015
--	--	--------------------

PAGE 4, OF 5

MANCOZEB DATA SUBMITTERS

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P.O. Box 18300
GREENSBORO, NC 27419

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RESEARCH TRIANGLE PARK, NC 27709

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1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDONNELL BLVD.
ST. LOUIS, MO 63042

CEREXAGRI, INC.
630 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

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P.O. Box 660065
DALLAS, TX 75266

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3171 MCCALL DR.
ATLANTA, GA 30341

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PLANT PROTECTANTS, LLC
35801 ROAD 132
VISALIA, CA 93292

GENERIC ENDANGERED SPECIES TASK FORCE
4110 136TH STREET, NORTHWEST
GIG HARBOR, WA 98332

FIFRA ENDANGERED SPECIES TASK FORCE, LLP
1350 I STREET, NW
WASHINGTON, DC 20006

Cheminova, Inc.
One Park Drive, Suite 400
Research Triangle Park, NC 27709

MACDERMID AGRICULTURAL SOLUTIONS, INC.
ATTN: REGISTRATION DEPARTMENT
245 FREIGHT STREET

WATERBURY,CT 06702 WILBUR-ELLIS COMPANY
2903 S. CEDAR AVENUE
FRESNO,CA 93725

EVERRIS NA, INC.
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D O'SHAUGHNESSY CONSULTING, INC
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SIMPLOT, J.R. COMPANY
P.O. Box 198
LATHROP,CA 95330

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DATA MATRIX

Date 03/26/2015			EPA Reg. No./File Symbol 89333-3		Page 1 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 03/26/2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 03/26/2015			EPA Reg. No./File Symbol 89333-3		Page 2 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			cite-all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			Signature 		

DATA MATRIX FOOTNOTES		
Date 03/26/2015	EPA Reg. No./File Symbol 89333-3	Page 3 of 5
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Signature		Name and Title Don O'Shaughnessy, Agent	Date 03/26/2015
-----------	---	--	--------------------

PAGE 4 OF 5

MANCOZEB DATA SUBMITTERS

SYNGENTA CROP PROTECTION, LLC
P.O. Box 18300
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1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDONNELL BLVD.
ST. LOUIS, MO 63042

CEREXAGRI, INC.
630 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

GUSTAFSON LLC
P.O. Box 660065
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FIFRA ENDANGERED SPECIES TASK FORCE, LLP
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WASHINGTON, DC 20006

Cheminova, Inc.
One Park Drive, Suite 400
Research Triangle Park, NC 27709

MACDERMID AGRICULTURAL SOLUTIONS, INC.
ATTN: REGISTRATION DEPARTMENT
245 FREIGHT STREET

WATERBURY,CT 06702 WILBUR-ELLIS COMPANY
2903 S. CEDAR AVENUE
FRESNO,CA 93725

EVERRIS NA, INC.
P.O. Box 3310
DUBLIN,OH 43016

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BEVERIDGE & DIAMOND, P.C.
1350 I STREET, N.W.
WASHINGTON,DC 20005

AGROMARKETING CO, INC
D O'SHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN,KY 42729

SIMPLOT, J.R. COMPANY
P.O. Box 198
LATHROP,CA 95330

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALLL DR. .
ATLANTA,GA 30341

SEPRO CORPORATION
11550 N. MERIDIAN ST., SUITE 600
CARMEL,IN 46032

RESIDENTIAL EXPOSURE JOINT VENTURE (RE
CSPA/PIR
1667 K STREET, NW, SUITE 300
WASHINGTON,DC 20006

ZENITH CROP SCIENCES, S.A.
D. O'SHAUGHNESSY CONSULTING, INC
427 HIDE AWAY CIRCLE
CUB RUN,KY 42729

Gibson, Tamue

From: Don O'Shaughnessy <doconslt@earthlink.net>
Sent: Wednesday, March 18, 2015 3:09 PM
To: Gibson, Tamue
Subject: Re: One more Data Matrix to Correct: Please Revise Your Data Matrix for 8933-3
Attachments: publicmatrixmancotechfeb26-15.pdf; ATT00001.htm


I though I had sent that - is there something in this that still needs fixing?

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DATA MATRIX

Date 02/26/2015			EPA Reg. No./File Symbol 89333-3		Page 1 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Signature 		

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Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			cite-all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 02/26/2015

DATA MATRIX FOOTNOTES

Date 02/26/2015	EPA Reg. No./File Symbol 89333-3	Page 3 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Signature 	Name and Title Don O'Shaughnessy, Agent	Date 02/26/2015
--	--	--------------------

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GIG HARBOR, WA 98332

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1350 I ST. NW
WASHINGTON DC, 20005

RESIDENTIAL EXPOSURE JOINT VENTURE MANCOZEB TASK FORCE
1667 K ST. NW, SUITE 300
WASHINGTON DC 20006

Gibson, Tamue

From: Gibson, Tamue
Sent: Wednesday, March 11, 2015 3:17 PM
To: 'Don O'Shaughnessy'
Cc: Johnson, Hope
Subject: RE: Please Revise Your Data Matrix (from your 2/27/15 resubmission)

Hello Don. Please also provide the public copy to page 3 of 4 and page 4 of 4 for product number 8933-3.

Data Matrix for 8933-3

- 1) The public copy for 8933-3 consists of pages 1 through 4. However, 2 pages were only provided within your previous emailed submission (page 1 of 4 and page 2 of 4). Please provide page 3 of 4 and page 4 of 4.

From: Don O'Shaughnessy [mailto:doconst@earthlink.net]
Sent: Wednesday, March 11, 2015 3:09 PM
To: Gibson, Tamue
Subject: Re: Please Revise Your Data Matrix (from your 2/27/15 resubmission)

Pages 5 and 6 have no "confidential" page equivalents so I did not repeat them, but never-the-less here you go.

Gibson, Tamue

From: Gibson, Tamue
Sent: Wednesday, March 11, 2015 2:39 PM
To: 'Don O'Shaughnessy'
Cc: Johnson, Hope
Subject: Please Revise Your Data Matrix (from your 2/27/15 resubmission)

Hello Don. Sorry. There are corrections to both data matrices (for products 8933-2 and 8933-3).

Data Matrix for 8933-2

- 1) The Agency copy for 8933-2 consists of pages 1 through 6. However, there are 2 pages of the data matrix that are pages 6 of 6. Please revise the signature page of the data matrix as your page 5 of 6.
- 2) The public copy for 8933-2, I am missing pages 5 of 6 and 6 of 6. Please provide both pages.

Data Matrix for 8933-3

- 1) The public copy for 8933-3 consists of pages 1 through 4. However, 2 pages were only provided within your previous emailed submission (page 1 of 4 and page 2 of 4). Please provide page 3 of 4 and page 4 of 4.

Thank you.

From: Don O'Shaughnessy [mailto:doconslt@earthlink.net]
Sent: Friday, February 27, 2015 7:46 PM
To: Gibson, Tamue
Subject: Re: Now?

Ah. Good. Thank you.
Don O'Shaughnessy, Ph.D., DABT, DABFM
President, DOC Inc.
427 Hide Away Circle
Cub Run KY 42729
270-524-5633 cell 270-537-5139
doctox@mac.com
www.regtox.net

On Feb 27, 2015, at 6:01 PM, Gibson, Tamue <Gibson.Tamue@epa.gov> wrote:

PERFECT-O!

Gibson, Tamue

From: Gibson, Tamue
Sent: Friday, February 27, 2015 12:18 PM
To: 'Don O'Shaughnessy'
Subject: RE: Please Revise Your Data Matrix to Include the Acute Tox data (cite-all)

Hello Don. Unfortunately no. Please list out all of the acute tox data as you had previously listed within your initial submission to the Agency.

Please revise the statement "all other product-specific and generic data" to "Generic Data".

From: Don O'Shaughnessy [mailto:doconst@earthlink.net]
Sent: Friday, February 27, 2015 11:40 AM
To: Gibson, Tamue
Subject: Re: Please Revise Your Data Matrix to Include the Acute Tox data (cite-all)

This work?

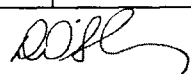
Gibson, Tamue

From: Don O'Shaughnessy <doconst@earthlink.net>
Sent: Friday, February 27, 2015 3:17 PM
To: Gibson, Tamue
Subject: Now?
Attachments: matrixmancotechfeb26-15.pdf; ATT00001.htm; matrixmanco80WP02-26-15.pdf; ATT00002.htm

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DATA MATRIX

Date 02/26/2015			EPA Reg. No./File Symbol 89333-3		Page 1 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 207 Bank St., Suite 412 Ottawa ON Canada K2P 2N2			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	(CSF) 48449100	Agria Canada, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	48449101	Agria Canada, Inc.	OWN	
830.1620	Description of Manufacturing Process	48449101	Agria Canada, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	48449101	Agria Canada, Inc.	OWN	
830.1750	Certified Limits	48229200	Agria Canada, Inc.	OWN	
830.1800	Enforcement analytical method	48449102	Agria Canada, Inc.	OWN	
830.6303	Physical State	48449103	Agria Canada, Inc.	OWN	
830.6304	Odor	48449103	Agria Canada, Inc.	OWN	
830.7300	Density	48449103	Agria Canada, Inc.	OWN	
830.6302	Color	48449103	Agria Canada, Inc.	OWN	
830.7000	pH	48449103	Agria Canada, Inc.	OWN	
830.7200	Melting point	48449103	Agria Canada, Inc.	OWN	
830.7220	Boiling point	48449103	Agria Canada, Inc.	OWN	
830.6315	Flammability	48449103	Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 02/26/2015

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DATA MATRIX

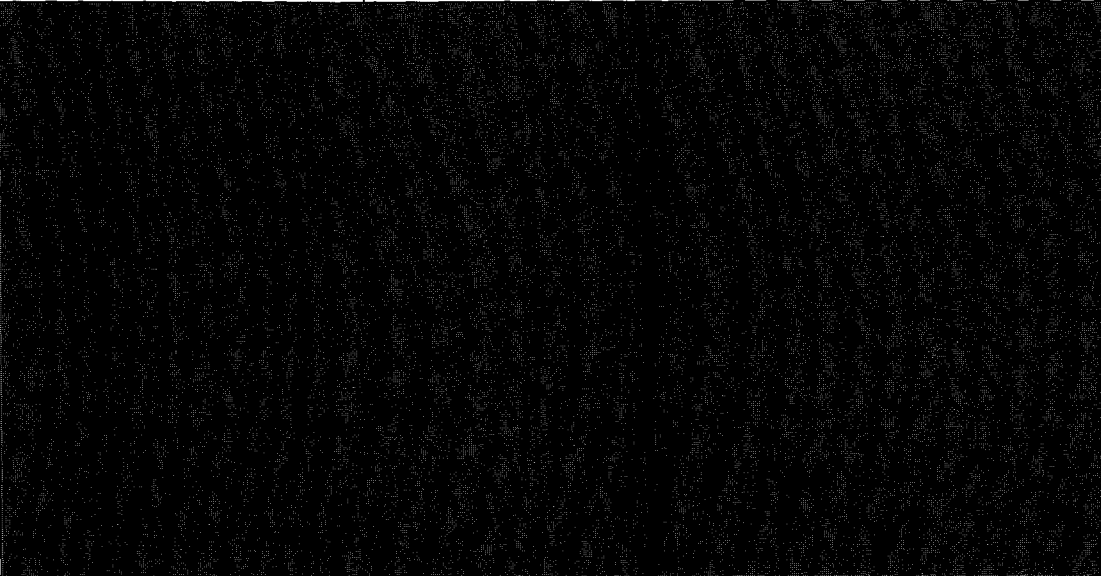

Date 02/26/2015			EPA Reg. No./File Symbol 89333-3		Page 2 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explosivity	48449103	Agria Canada, Inc.	OWN	
830.1700	Preliminary Analysis	48449102	Agria Canada, Inc.	OWN	
870.1100	acute oral toxicity	cite all	cite-all	PAY	1
870.1200	acute dermal toxicity	cite all	cite all	PAY	1
870.1300	acute inhalation toxicity	cite all	cite all	PAY	1
870.2400	acute eye irritation	cite all	cite all	PAY	1
870.2500	acute dermal irritation	cite all	cite all	PAY	1
870.2600	sensitization	cite all	cite all	PAY	1
generic data		cite all	cite all	PAY	1
Signature			Name and Title Don O'Shaughnessy, Agent		Date 02/26/2015

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Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 02/26/2015

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Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			cite-all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			cite all	PAY	1
			Signature 		

DATA MATRIX FOOTNOTES		
Date 02/26/2015	EPA Reg. No./File Symbol 89333-3	Page 3 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

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INDIANAPOLIS, IN 46268

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This work?

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401 M Street, S.W.
WASHINGTON, D.C. 20460

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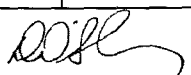
DATA MATRIX

Date 02/26/2015			EPA Reg. No./File Symbol 89333-3		Page 1 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 207 Bank St., Suite 412 Ottawa ON Canada K2P 2N2			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	(CSF) 48449100	Agria Canada, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	48449101	Agria Canada, Inc.	OWN	
830.1620	Description of Manufacturing Process	48449101	Agria Canada, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	48449101	Agria Canada, Inc.	OWN	
830.1750	Certified Limits	48229200	Agria Canada, Inc.	OWN	
830.1800	Enforcement analytical method	48449102	Agria Canada, Inc.	OWN	
830.6303	Physical State	48449103	Agria Canada, Inc.	OWN	
830.6304	Odor	48449103	Agria Canada, Inc.	OWN	
830.7300	Density	48449103	Agria Canada, Inc.	OWN	
830.6302	Color	48449103	Agria Canada, Inc.	OWN	
830.7000	pH	48449103	Agria Canada, Inc.	OWN	
830.7200	Melting point	48449103	Agria Canada, Inc.	OWN	
830.7220	Boiling point	48449103	Agria Canada, Inc.	OWN	
830.6315	Flammability	48449103	Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 02/26/2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 02/26/2015			EPA Reg. No./File Symbol 89333-3		Page 2 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explosivity	48449103	Agria Canada, Inc.	OWN	
830.1700	Preliminary Analysis	48449102	Agria Canada, Inc.	OWN	
acute toxicity data		cite all		PAY	1
all other product-specific and generic data		cite all		PAY	1
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 02/26/2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Date 02/26/2015			EPA Reg. No./File Symbol 89333-3		Page 1 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 02/26/2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
				PAY	1
				PAY	1
			Signature 		

DATA MATRIX FOOTNOTES		
Date 02/26/2015	EPA Reg. No./File Symbol 89333-3	Page 3 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Signature 	Name and Title Don O'Shaughnessy, Agent	Date 02/26/2015
--	--	--------------------

SYNGENTA CROP PROTECTION, LLC
P.O. Box 18300
410 Swing Rd.
GREENSBORO, NC 27419

BAYER CROPSCIENCE LP
P.O. Box 12014
2 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

E. I. DU PONT DE NEMOURS AND CO., INC.
1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDONNELL BLVD.
ST. LOUIS, MO 63042

CEREXAGRI, INC.
630 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

BASF CORPORATION
P.O. Box 13528
26 DAVIS DRIVE
RESEARCH TRIANGLE PARK, NC 27709

MANCOZEB TASK FORCE
500 North Capitol St. NW
Washington DC 20001

DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 308/2E
INDIANAPOLIS, IN 46268

EBDC/ETU TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

SPRAY DRIFT TASK FORCE
1900 K STREET, NW
WASHINGTON, DC 20006

UNITED PHOSPHORUS, INC
630 FREEDOM BUSINESS CENTER,
SUITE 402
KING OF PRUSSIA, PA 19401

AGRICULTURAL REENTRY TASK FORCE
1350 I STREET, N.W.
WASHINGTON, DC 20005

AGSCO INC
P.O. Box 13458
GRAND FORKS, ND 58208

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALLL DR.
ATLANTA, GA 30341

AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
P.O. Box 509
1720 PROSPECT DRIVE
MACON, MO 63552

PLANT PROTECTANTS, LLC
35801 ROAD 132
VISALIA, CA 93292

GENERIC ENDANGERED SPECIES TASK FORCE
4110 136TH STREET, NORTHWEST
GIG HARBOR, WA 98332

FIFRA ENDANGERED SPECIES TASK FORCE, LLP
1350 I STREET, NW
WASHINGTON, DC 20006

CHEMINOVA, INC.
ONE PARK DRIVE, SUITE 400
RESEARCH TRIANGLE PARK, NC 27709

OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE
1350 I ST. NW
WASHINGTON DC, 20005

RESIDENTIAL EXPOSURE JOINT VENTURE MANCOZEB TASK FORCE
1667 K ST. NW, SUITE 300
WASHINGTON DC 20006

Gibson, Tamue

From: Gibson, Tamue
Sent: Wednesday, February 25, 2015 11:54 AM
To: 'Don O'Shaughnessy'
Subject: Please Revise Your Data Matrix to Include the Acute Tox data (cite-all)
Attachments: matrixmancotechfeb20-15.pdf; ATT00001.htm; matrixmancotechfeb20-15.pdf; ATT00002.htm

Hello Don. Please revise your data matrices (for both products) to include (as you had listed before) the acute tox data. Though acute tox is supported as cite-all, you must list it with the product specific data. Please revise the statement "all other data" to "Generic Data".

Thank you.

Tamue

From: Don O'Shaughnessy [mailto:docons1t@earthlink.net]
Sent: Friday, February 20, 2015 4:19 PM
To: Gibson, Tamue
Subject: ignore previous version

Blood MSWord was giving free games.
This is better

Gibson, Tamue


From: Don O'Shaughnessy <doconslt@earthlink.net>
Sent: Friday, February 20, 2015 4:03 PM
To: Gibson, Tamue
Subject: Re: Mancozeb Technical, EPA Registration Number 89333-3 (Fast Track-Adding Walnuts to Label)
Attachments: matrixmanco80WP02-20-15.pdf; ATT00001.htm; matrixmanco80WP02-20-15.pdf; ATT00002.htm

Here you go,

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401 M Street, S.W.
WASHINGTON, D.C. 20460

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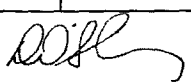
DATA MATRIX

Date 02/20/2015			EPA Reg. No./File Symbol 89333-3		Page 1 of 4
Applicant's/Registrant's Name & Address Agria Canada, Inc., 207 Bank St., Suite 412 Ottawa ON Canada K2P 2N2			Product Mancozeb Technical Fungicide		
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830.7200	Melting point	48449103	Agria Canada, Inc.	OWN	
830.7220	Boiling point	48449103	Agria Canada, Inc.	OWN	
830.6315	Flammability	48449103	Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 02/20/2015

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830.1700	Preliminary Analysis	48449102	Agria Canada, Inc.	OWN	
all other data		cite-all		PAY	1
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 02/20/2015

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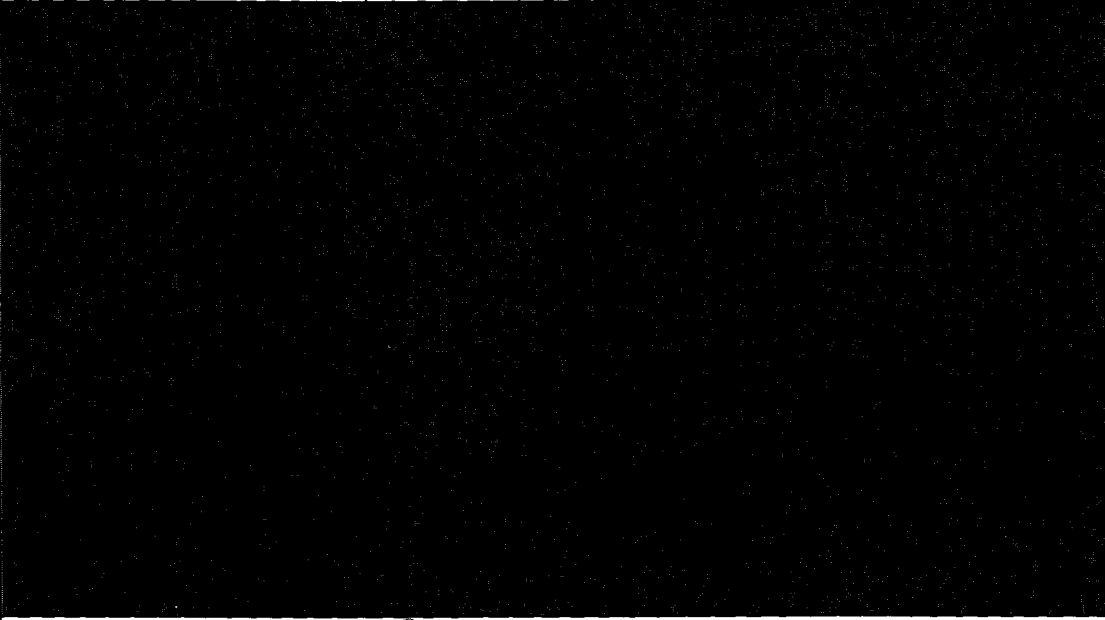

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Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
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			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
Signature 	Name and Title Don O'Shaughnessy, Agent		Date 02/20/2015		

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			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
				PAY	1
			Signature 		

DATA MATRIX FOOTNOTES		
Date 02/20/2015	EPA Reg. No./File Symbol 89333-3	Page 3 of 64
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Signature		Name and Title Don O'Shaughnessy, Agent	Date 02/20/2015
-----------	---	--	--------------------

SYNGENTA CROP PROTECTION, LLC
P.O. Box 18300
GREENSBORO, NC 27419

BAYER CROPSCIENCE LP
P.O. Box 12014
2 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

E. I. DU PONT DE NEMOURS AND CO., INC.
1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDONNELL BLVD.
ST. LOUIS, MO 63042

CEREXAGRI, INC.
630 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

BASF CORPORATION
P.O. Box 13528
26 DAVIS DRIVE
RESEARCH TRIANGLE PARK, NC 27709

MANCOZEB TASK FORCE
500 North Capitol St. NW
Washington DC 20001

DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 308/2E
INDIANAPOLIS, IN 46268

EBDC/ETU TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

SPRAY DRIFT TASK FORCE
1900 K STREET, NW
WASHINGTON, DC 20006

UNITED PHOSPHORUS, INC
630 FREEDOM BUSINESS CENTER,
SUITE 402
KING OF PRUSSIA, PA 19401

AGRICULTURAL REENTRY TASK FORCE
1350 I STREET, N.W.
WASHINGTON, DC 20005

AGSCO INC
P.O. Box 13458
GRAND FORKS, ND 58208

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALL DR. .
ATLANTA, GA 30341

AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
P.O. Box 509
1720 PROSPECT DRIVE
MACON, MO 63552

PLANT PROTECTANTS, LLC
35801 ROAD 132
VISALIA, CA 93292

GENERIC ENDANGERED SPECIES TASK FORCE
4110 136TH STREET, NORTHWEST
GIG HARBOR, WA 98332

FIFRA ENDANGERED SPECIES TASK FORCE, LLP
1350 I STREET, NW
WASHINGTON, DC 20006

CHEMINOVA, INC.
ONE PARK DRIVE, SUITE 400
RESEARCH TRIANGLE PARK, NC 27709

OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE
1350 I ST. NW
WASHINGTON DC, 20005

RESIDENTIAL EXPOSURE JOINT VENTURE MANCOZEB TASK FORCE
1667 K ST. NW, SUITE 300
WASHINGTON DC 20006

From: Gibson, Tamue
Sent: Thursday, February 19, 2015 7:16 PM
To: 'Don O'Shaughnessy'
Subject: Mancozeb Technical, EPA Registration Number 89333-3 (Fast Track-Adding Walnuts to Label)

Hello Mr. O'Shaughnessy.

Your fast track amendment adding walnuts to your technical label needs revisions to the data matrix. Please revise the Agency copy per the revisions below. Revise the "public" copy (page numbering) accordingly as well.

Data matrix form:

1. Renumber your data matrix forms to pages 1 through 4 and include the "Mancozeb Data Submitters" page as your last page (4 of 4).
2. Within the "Mancozeb Data Submitters" page, revise the listing of "Syngenta Crop Protection, LLC" to the following address:
"Syngenta Crop Protection, LLC
P.O. Box 18300
410 Swing Road
Greensboro, NC 27419"
3. You have the listing of "Gustafson, LLC, P.O. Box 660065, Dallas, TX 75266" listed twice. Delete 1 of the 2 listing.
4. You must add the following task force to your data matrix.

"Mancozeb Task Force
500 North Capitol Street, NW
Washington, DC 20001"

"Outdoor Residential Exposure Task Force
1350 I Street, NW
Washington, DC 20005"

"Residential Exposure Joint Venture Mancozeb Task Force (REJV)
1667 K Street, NW, Suite 300
Washington, DC 20006"

Thank you.

Tamue



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 25, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

DON O'SHAUGHNESSY, PH.D
D. O'SHAUGHNESSY CONSULTING, INC.
AGRIA CANADA, INC.
C/O D. O'SHAUGHNESSY CONSULTING, INC.
427 HIDE AWAY CIRCLE
CUB RUN, KY 42729-

PRODUCT NAME: Mancozeb Technical
COMPANY NAME: AGRIA CANADA, INC.
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 89333-3
EPA RECEIPT DATE: 07/24/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 21, at (703) 305-5410.

Sincerely,

A handwritten signature in black ink, appearing to be "J. [unclear]", is written over the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



Fee for Service

{955439K~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 21

Receipt No.

S-

955439

EPA File Symbol/Reg. No.

89333-3

Pin-Punch Date:

7/24/2014

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use



Uncleared Inert in Product

Reviewer: 

Date: 7-25-14

Remarks:

- cite all for generic data



United States
Environmental Protection Agency
Washington, DC 20460

Form Approved. OMB No. 2070-0060

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 89333 - 3	2. EPA Product Manager Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Agria Canada / Mancozeb Technical Fungicide	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Agria Canada, Inc., 133 Mavety St., Toronto, ON M6P 2L8 CANADA <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70506-185 Product Name Penncozeb Technical	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Me-too addition of walnuts to label.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) foil lined		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lb		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Don O'Shaughnessy	Title Agent	Telephone No. (Include Area Code) 270-524-5633
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Don O'Shaughnessy	5. Date July 21, 2014	

doc
D. O'Shaughnessy Consulting, Inc.

July 22, 2014

Dr. Mary Waller (PM 21)
US EPA, RD (7504P)
Rm. S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Dear Dr. Waller,
RE: Application to amend Mancozeb Technical Fungicide on behalf of Agria Canada, Inc.
(89333-~~1~~)₃

Agria Canada has applied to amend Fortuna 75 WDG Fungicide (89333-1) to include walnuts via a time-limited supplemental label, in keeping with other products (e.g. Penncozeb 75 DF (70506-185) and Koverall (67760-110). Agria Canada has offered to pay compensation for data required to support this use, as indicated in the included matrix and Certification with Respect to Citation of Data. Accordingly, Agria hereby also applies to amend the Mancozeb Technical label to include walnuts.

As always, if questions arise regarding this submission, please contact at the co-ordinates on this letterhead.

Sincerely,



Don O'Shaughnessy, Ph.D., DABT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
 Agria Canada, Inc..

EPA Registration Number/File Symbol
 89333-3

Active Ingredient(s) and/or representative test compound(s)
 mancozeb

Date 07/22/2014

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
 outdoor food, non-food

Product Name Mancozeb Technical Fungicide

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

07/22/2014


Typed or Printed Name and Title

Don O'Shaughnessy, Agent

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date 07/21/14			EPA Reg. No./File Symbol 89333-3		Page 1 of 3
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8			Product Mancozeb Technical Fungicide		
Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	(CSF) 48449100	Agria Canada, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	48449101	Agria Canada, Inc.	OWN	
830.1620	Description of Manufacturing Process	48449101	Agria Canada, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	48449101	Agria Canada, Inc.	OWN	
830.1750	Certified Limits	48229200	Agria Canada, Inc.	OWN	
830.1800	Enforcement analytical method	48449102	Agria Canada, Inc.	OWN	
830.6303	Physical State	48449103	Agria Canada, Inc.	OWN	
830.6304	Odor	48449103	Agria Canada, Inc.	OWN	
830.7300	Density	48449103	Agria Canada, Inc.	OWN	
830.6302	Color	48449103	Agria Canada, Inc.	OWN	
830.7000	pH	48449103	Agria Canada, Inc.	OWN	
830.7200	Melting point	48449103	Agria Canada, Inc.	OWN	
830.7220	Boiling point	48449103	Agria Canada, Inc.	OWN	
830.6315	Flammability	48449103	Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 07/21/14

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Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explosivity	48449103	Agria Canada, Inc.	OWN	
830.1700	Preliminary Analysis	48449102	Agria Canada, Inc.	OWN	
all other data		cite-all		PAY	1
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 07/21/14

DATA MATRIX FOOTNOTES		
Date 07/21/14	EPA Reg. No./File Symbol 89333-3	Page ³ 1 of 3
Applicant's/Registrant's Name & Address Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8	Product Mancozeb Technical Fungicide	

Footnote 1: A list of data submitters sent an offer to pay has been attached (following page)

Signature		Name and Title Don O'Shaughnessy, Agent	Date 07/21/14
-----------	---	--	------------------

SYNGENTA CROP PROTECTION, LLC
P.O. Box 18300
GREENSBORO, NC 27419

BAYER CROPSCIENCE LP
P.O. Box 12014
2 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

E. I. DU PONT DE NEMOURS AND CO., INC.
1007 MARKET STREET
WILMINGTON, DE 19898

MALLINCKRODT INC.
675 MCDONNELL BLVD.
ST. LOUIS, MO 63042

CEREXAGRI, INC.
630 FREEDOM BUSINESS CENTER, SUITE 402
KING OF PRUSSIA, PA 19406

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

BASF CORPORATION
P.O. Box 13528
26 DAVIS DRIVE
RESEARCH TRIANGLE PARK, NC 27709

MANCOZEB TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 308/2E
INDIANAPOLIS, IN 46268

EBDC/ETU TASK FORCE
600 13TH STREET, NW
WASHINGTON, DC 20005

SPRAY DRIFT TASK FORCE
1900 K STREET, NW
WASHINGTON, DC 20006

UNITED PHOSPHORUS, INC
630 FREEDOM BUSINESS CENTER,
SUITE 402
KING OF PRUSSIA, PA 19401

AGRICULTURAL REENTRY TASK FORCE
1350 I STREET, N.W.
WASHINGTON, DC 20005

AGSCO INC
P.O. Box 13458
GRAND FORKS, ND 58208

GUSTAFSON LLC
P.O. Box 660065
DALLAS, TX 75266

PARKER ENGINEERING & CHEMICALS, INC.
3171 MCCALLL DR. .
ATLANTA, GA 30341

AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
P.O. Box 509
1720 PROSPECT DRIVE
MACON, MO 63552

PLANT PROTECTANTS, LLC
35801 ROAD 132
VISALIA, CA 93292

GENERIC ENDANGERED SPECIES TASK FORCE
4110 136TH STREET, NORTHWEST
GIG HARBOR, WA 98332


FIFRA ENDANGERED SPECIES TASK FORCE, LLP
1350 I STREET, NW
WASHINGTON, DC 20006

CHEMINOVA, INC.
ONE PARK DRIVE, SUITE 400
RESEARCH TRIANGLE PARK, NC 27709

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
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			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
Signature 			Name and Title Don O'Shaughnessy, Agent		Date 07/21/14

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Ingredients mancozeb					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agria Canada, Inc.	OWN	
			Agria Canada, Inc.	OWN	
				PAY	1
			Signature		

MANCOZEB TECHNICAL
A Fungicide for Formulating Use.

ACTIVE INGREDIENT:

Mancozeb (a coordination product of zinc ion and manganese ethylenebis- dithiocarbamate) . . .
93.2 %
(in which the ingredients are:)
Manganese++ 18.1 %
Zinc++ 2.2 %
Ethylenebisdithiocarbamate ion (C₄H₆N₂S₄) . . . 70.5 %

OTHER INGREDIENTS 6.8 %
TOTAL: 100.0 %

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

IF SWALLOWED: <ul style="list-style-type: none">• Call poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING: <ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15 to 20 minutes.• Call a poison control center or doctor for treatment advice.
IF IN EYES: <ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water or 15 to 20 minutes.• Remove contact lenses, if present, after the first minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
IF INHALED: <ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378.

EPA Reg. No. 89333-3

EPA Est. No. _____

Net Contents _____

Agria Canada, Inc., 133 Mavety St., Toronto, Ont. Canada M6P 2L8
416-628-5174

Product of Bulgaria

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed, inhaled or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse. Avoid breathing dust.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or public water unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority.

For guidance, contact your State Water Board or Regional Office of the Environmental Protection Agency.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Only for formulation into a fungicide for the following uses:

Field Corn, Corn grown for seed, Popcorn, Cotton (except foliar use), Peanuts, Sugarbeets, Wheat, Barley, Oats, Rye, Asparagus, Sweet corn, Cucumbers, Fennel, Melons (including Cantaloupes, Casabas, Crenshaws, Honeydews, Watermelons), Onions (dry bulb and furrow drench), Potatoes, Potato tuber, Squash (summer), Tomatoes, Apples, Crabapples, Pears, Quince, Bananas, Cranberries, Grapes, Papayas, Ornamentals, walnuts¹.

This product may be used to formulate products for specific use(s) not listed on this manufacturing use product label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

Manufacturers of products formulated as wettable powders must prohibit the following:

- application of wettable powder products to turf on sod farms
- application of wettable powder formulations to turf unless packaged in water soluble packaging

Manufacturers of products formulated as liquids must prohibit the following:

- application of liquids aerially to sod farms

This product may not be used to manufacture end use products for use on golf courses.

Manufacturers of products formulated as dusts must require closed systems for commercial seed and seedpiece treatment.

NOTE 1. Use on walnuts is permitted only with a supplemental label in effect up to the date indicated on the supplemental label.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE: Store in original container in a dry area. If allowed to become wet, the product will deteriorate and present a fire hazard. Keep away from sources of ignition, (e.g. sparks and open flame.) Close bag when not in use. Do not store in a manner where cross-contamination with other pesticides, fertilizers, food or feed could occur. If spilled during storage or handling, sweep up spillage and dispose of in accordance with the Pesticide Disposal Instructions listed below.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill, or by incineration, or if allowed by State and Local authorities, by burning. If burned, stay out of smoke.

WARRANTY AND CONDITIONS OF SALE

Agria Canada, Inc. warrants only that the material contained herein conforms to the chemical description on the label and is reasonably fit for use therein described when used in accordance with the Directions for Use set forth in the label.

To the extent permitted under applicable law, any damage arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages, such as loss of profits or values or any other special or indirect damages.

Agria Canada, Inc. makes no other express or implied warranty including any other express or implied warranty of FITNESS or MERCHANTABILITY.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

The sale of this product does not include a license under any patent owned by **Agria Canada, Inc.**

Garvie, Heather

From: Gibson, Tamue
Sent: Tuesday, August 27, 2013 2:53 PM
To: Don O'Shaughnessy
Cc: Garvie, Heather
Subject: AMENDMENT to the Guidance for Mancozeb Products with Golf Course Fairway Use Correspondence
Attachments: [Untitled].pdf

Dear Dr. O' Shaughnessy:

This letter serves to inform you that upon reevaluation of the estimated risk, the Agency has determined there is no longer a risk of concern and that the Agency does not require you to execute any activities to terminate the use on golf course fairways from your registration. Please access the attachment for a copy of the amended guidance correspondence for mancozeb products with golf course fairway use.

Regards,

Tamue L. Gibson, M.S.
Biologist
United States Environmental Protection Agency
Registration Division/Fungicide Branch
gibson.tamue@epa.gov *Email Address*
(703) 305-9096 *Voice Mail*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AUG 27 2013

Attention: Don O'Shaughnessy, Agri Canada Inc.

AMENDMENT to the Guidance for Mancozeb Products with Golf Course Fairway Use Correspondence

Why You Are Receiving this Letter

On April 30, 2013, you received a letter from Lois A. Rossi, Director, Registration Division instructing companies who hold registrations for a product(s) containing mancozeb approved for use on golf course fairways or for formulation into a product approved for use on golf course to terminate fairway use from their registrations. The Agency previously identified a risk of concern when conducting a risk assessment for pending new uses of mancozeb. The Agency determined that prohibiting the use of mancozeb on golf course fairways (tees and greens were not affected) would be appropriate mitigation. This letter serves to inform you that, upon reevaluation, the Agency has determined there is no longer a risk of concern and that the Agency does not require you to execute any activities to terminate this use from your registration.

Why There Is No Risk Of Concern

As the Agency was developing and issuing the correspondence referenced above to the affected registrants, the Agency finalized the adoption of revised standard operation procedures (SOPs) for assessing turf scenarios using the turf transferable residue study (TTR). Using the revised SOPs, the Agency recalculated the estimated risk using the TTR residue data from mancozeb-treated turf after application. The recalculation lowered the value of the input used in the risk assessment's post-application golf course exposure scenario which in turn reduced all risk below the Agency's level of concern. There are now no estimated short-term risks of concern for female golfers age 13-49 and there are no estimated non-cancer/short-term risks of concern for adults or youth golfing on treated turf.

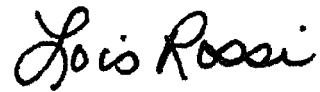
How Does EPA Intend to Handle Any Already Submitted Amendment Request to Terminate Golf Course Use

The Agency will administratively withdraw any applications to amend your product label(s) to remove golf course use that were received after April 30, 2013 unless you inform the Agency that you still want your applications processed. Unless we hear from you by August 30, 2013, these applications will be considered administratively withdrawn.

Contact for More Information

If you have questions related to this letter, you may contact Heather Garvie at (703) 308-0034 or Tamue Gibson at (703) 305-9096.

Sincerely,

A handwritten signature in black ink that reads "Lois Rossi". The signature is written in a cursive, flowing style.

Lois Rossi, Director
Registration Division

Explore Registrations

Reg Number: 89333-3 Reg. Type: Product Registration - Section 3 Status: Registered (27-Feb-2012)
 Name: Mancozeb Technical <View Registration Details>

(No New Receipts)

S.	Submission Type	OPP Rec'd Date	Resubmission	Description
----	-----------------	----------------	--------------	-------------

- ...Decisions...

- Data Requirements
- D: Pending; 478912; 89333-3;300;LABEL REVISI
- 75-Day Letters
- S: 934734 5/1/2013; Amendment; 89333
- + D: Pending; 466766; 89333-3;320;DATA REQUIF
- + D: Closed; 457801; 89333-3;R300;NEW PRODU

S: 934734 Reg #: 89333-3

Submission Type: Amendment

Resubmission?: ☐ Yes ☒ No

E-Sub #:

Decision #: 478912; 300; LABEL REVISION; NO DATA REQUIRED;

Submitter Company: AGRIA CANADA, INC

Application Date: 23-Apr-2013

OPP Received Date: 01-May-2013

Date Sent to Risk manager: 03-May-2013

Studies Included?: ☐ Yes ☒ No

Fast Track?: ☒ Yes ☐ No

Form A Signed?: ☐ Yes ☐ No ☒ None

Date:

Form B Signed?: ☐ Yes ☐ No ☒ None

Date:

Reviewer: Garvie, Heather

Received DT:

Editable Due DT:

Submission Due DT: 30-Jul-2013

Response: 0, 01-May-2013

Priority Weight:

Priority Points:

Comments: Per EPA request, add specific prohibition against use on golf courses

MAY 17 2013

FAST-TRACK AMENDMENTS – Completeness Screening Checklist

Expert's In-Processing Signature: E. Faltus Date: 5/7/13 PM #: 21

EPA Reg. Number: <u>89333-3</u>		EPA Receipt Date: <u>5/1/13</u>		
	Checklist Item	Yes	No	N/A
1	Application Form (EPA Form 8570-1) - signed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Certification with Respect to Citation of Data (EPA Form 8570-34) - signed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	Data Matrix (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	a) Selective Method?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Cite-All Method?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Public copy of Matrix provided? See PR Notice 98-5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Is Label included? (5 copies) <u>1 copy only</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	a) Electronic Label submitted?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments:			

Receipt for Section 3

S: 934734

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 99333 AGRIA CANADA, INC

V

Risk Manager: Registration Division, Risk Management Team 21

Product #: 99333-3 Product Name: Mancozeb Technical

Override#:

Me Too
Section3: 19713-613

Me Too
Product Name: DREXEL MANCOZEB TECHNICAL

Application Date: 23-Apr-2013



OPP Rec'd Date: 01-May-2013



Front End Date: 01-May-2013



Risk Manager Send Date: 03-May-2013



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Label amendment

Form A: ☐

Signature Date:

Form B: ☐

New Ingredient

Request Date:

New Ingredient

Received Date:

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Paper Label

III

View/Edit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 3, 2013

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DON O'SHAUGHNESSY, PH.D
D. O'SHAUGHNESSY CONSULTING, INC
AGRIA CANADA, INC
427 HIDE AWAY CIRCLE
CUB RUN, KY 42729-

PRODUCT NAME: Mancozeb Technical
COMPANY NAME: AGRIA CANADA, INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 89333-3
EPA RECEIPT DATE: 05/01/13

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 21, at {Phone Number}.

Sincerely,

A handwritten signature in black ink, appearing to be "SJA", is written over the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{9347342~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 21

Receipt No.

S- 934734

EPA File Symbol/Reg. No.

89333-3

Pin-Punch Date:

5/1/2013

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Steve Schaefer

Date: 5/3/13

Remarks:

doc
D. O'Shaughnessy Consulting, Inc.

April 23, 2013

Ms. Mary Waller (PM 21)
US EPA, RD (7504P)
Rm. S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501
VIA EMAIL

Dear Ms. Waller,

RE: Mancozeb technical and MUP (89333-2, 89333-3): Specific prohibition of use on golf courses.

Per telephone request from EPA, enclosed are applications to amend the subject labels to specifically prohibit use on golf courses.

As always, thank you for your attention to this so far, and if you require any further action, please contact me at the co-ordinates on this letterhead or at my cell # (270-537-5139).

Sincerely,



Don O'Shaughnessy, Ph.D., DABT



United States
Environmental Protection Agency
Washington, DC 20460

Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 89333 - 3	2. EPA Product Manager Waller	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Agria Canada / Mancozeb Technical	PM# 21	
5. Name and Address of Applicant (Include ZIP Code) Agria Canada, Inc., 133 Mavety St., Toronto, ON M6P 2L8 CANADA <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
Per EPA request, add specific prohibition against use on golf courses

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>* Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____ foil lined		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1, 5, 10, 25 Kg		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Don O'Shaughnessy		Title Agent		Telephone No. (Include Area Code) 270-524-5633	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent			
4. Typed Name Don O'Shaughnessy		5. Date April 23, 2013			

FOR OFFICIAL USE ONLY

FILE SYMBOL

REGISTRATION NO.

87845-11

CONFIDENTIAL STATEMENT OF FORMULA ENCLOSED

DATE SUBMITTED	SUBMITTED BY (✓)	
	APPLICANT	BASIC SUPPLIER
NOV 18 2011		

**Do Not Write Comments,
Formula, or Parts of Formula
on This Envelope**

NOTE

It shall be unlawful—for any person to use for his own advantage or to reveal, other than to the Secretary, or officials or employees of the United States Department of Agriculture or other Federal agencies, or to the courts in response to a subpoena, or to physicians, and in emergencies to pharmacists and other qualified persons, for use in the preparation of antidotes, in accordance with such directions as the Secretary may prescribe, any information relative to formulas of products acquired by authority of Section 4 of the "Federal Insecticide, Fungicide, and Rodenticide Act."

